

The Kantrow Law Group, PLLC  
Attorneys for Debtor  
732 Smithtown Bypass, Suite 101  
Smithtown, NY 11787  
Fred S. Kantrow, Esq.  
Hailey L. Kantrow, Esq.  
516 703 3672

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re:

MARC DANIEL RUTLEDGE,  
a/k/a MARC D. RUTLEDGE,  
a/k/a MARC RUTLEDGE,

Chapter 7  
Case No. 23-71244-ast

Debtor.

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**DEBTOR’S APPLICATION SEEKING ENTRY OF AN ORDER  
SCHEDULING A HEARING ON AN EXPEDITED BASIS**

TO: HON. ALAN S. TRUST  
CHIEF UNITED STATES BANKRUPTCY JUDGE

Marc Daniel Rutledge, a/k/a Marc D. Rutledge, a/k/a Marc Rutledge, the debtor (the “Debtor”), by and through his attorneys, The Kantrow Law Group, PLLC, respectfully submits this as and for his application (the “Application”) seeking the entry of an Order directing a hearing on an expedited basis to consider the Debtor’s application to compel JPMorgan Chase Bank to release accounts and to impose sanctions for its willful violation of the automatic stay, and sates as follows:

1. As more fully set forth in the underlying application, the Debtor filed for relief on April 11, 2023 (the “Petition Date”). As of the Petition Date, the Debtor maintained bank accounts as JPMorgan Chase Bank (“Chase”) which accounts were “frozen” by a judgment creditor. Despite the filing of the voluntary petition and despite having actual knowledge of the filing and having been advised by the judgment creditor’s counsel to release the accounts, Chase has simply failed or refused to do so.

2. This continuing restraint against the Debtor's property is a violation of the automatic stay and has caused a significant hardship for the Debtor. Despite the Debtor's best efforts to have the funds released, he has been unable to accomplish what should have happened automatically.

3. The Debtor seeks expedited relief in this regard.

WHEREFORE, the Debtor respectfully requests that this Honorable Court schedule a hearing on an expedited basis to consider granting further relief.

Dated: Smithtown, New York  
May 9, 2023

The Kantrow Law Group, PLLC  
Attorneys for the Debtor

BY: S/Fred S. Kantrow  
Fred S. Kantrow  
732 Smithtown Bypass, Suite 101  
Smithtown, New York 11787  
516 703 3672  
[fkantrow@thekantrowlawgroup.com](mailto:fkantrow@thekantrowlawgroup.com)